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SARAH STEWART

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

SARAH STEWART,

Plaintiff,

v.

SEIU UNITED HEALTHCARE WORKERS-  
WEST (SEIU Local 2005),

Defendant.

No. CV 11-04438 JSW

**NOTICE OF SETTLEMENT OF  
ACTION, STIPULATION REGARDING  
TRIAL; ~~PROPOSED~~ ORDER**

Judge: Hon. Jeffrey S. White

Trial Date: March 11, 2013

The parties participated in a settlement conference with Magistrate Judge Elizabeth LaPorte on January 18, 2013, and reached an agreement in principal to fully resolve all remaining claims in the case. The terms of the settlement were confirmed on the record and the agreement reached was binding as to all parties.

The parties are currently in the process of finalizing the Settlement Agreement and anticipate that the Agreement will be fully executed by all parties on or before Thursday,

February 28, 2013, with payment of the settlement proceeds to follow within fifteen (15) business days after Plaintiff executes the Agreement.

Defendant SEIU United Healthcare Workers-West agrees that it will not unreasonably withhold the settlement proceeds once received from the carrier and will disburse the funds to Plaintiff's counsel via overnight delivery as soon as possible. Once the settlement proceeds have been paid, Plaintiff will prepare and file a request that the Court dismiss the entire action with prejudice.

Based on the settlement, the parties by and through their counsel hereby stipulate and agree that all currently scheduled matters in this case can be taken off calendar and request that the Court vacate the trial date and set a date by which the request for dismissal must be submitted.

Dated: February 8, 2013

WEINBERG, ROGER & ROSENFELD  
A Professional Corporation

By: /s/ Roberta D. Perkins  
ROBERTA D. PERKINS  
Attorneys for Defendant  
SEIU UNITED HEALTHCARE WORKERS-  
WEST

Dated: February 8, 2013

SHERRY LYNN MINSON, ESQ.

By: /s/ Sherry L. Minson  
SHERRY LYNN MINSON  
Attorneys for Plaintiff  
SARAH STEWART

**ORDER**

Pursuant to stipulation, IT IS SO ORDERED. Plaintiff shall submit a request for dismissal of the entire action with prejudice no later than March 15, 2013.

Dated: February 11, 2013

  
JEFFREY S. WHITE  
UNITED STATES DISTRICT JUDGE

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